

FILED BY *[Signature]* D.C.

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THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
WD OF TN, MEMPHIS

BRIDGET HANSON,

Plaintiff,

vs.

No. 05-2355 Ma/V
JURY DEMANDED

MODERN MILLY, INC. d/b/a ELLA,

Defendant.

[PROPOSED] RULE 16(b) SCHEDULING ORDER

A scheduling conference was held by and among counsel for the parties on August 17, 2005.

At the scheduling conference, the following dates were established as the final dates for:

RULE 26(a)(1) INITIAL DISCLOSURE DEADLINE: September 16, 2005

JOINING PARTIES: October 17, 2005

AMENDING PLEADINGS: October 17, 2005

INITIAL MOTIONS TO DISMISS: November 30, 2005

COMPLETING ALL DISCOVERY (except as hereinafter noted): April 28, 2006

- (a) DOCUMENT PRODUCTION: Requests must be served in time for production to be completed by April 28, 2006
- (b) DEPOSITIONS, INTERROGATORIES, AND REQUESTS FOR ADMISSIONS: All requests and deposition notices must be served in time for responses to be served, and depositions taken, by April 28, 2006; maximum of fifteen (15) depositions per party; each deposition is limited to five (5) hours; the maximum number of Interrogatories to issue to any other party is twenty-five (25)
- (c) EXPERT WITNESS DISCLOSURE (Fed. R. Civ. P. 26):
 - (1) DISCLOSURE OF PLAINTIFFS' RULE 26 EXPERT

INFORMATION: February 28, 2006

(2) DISCLOSURE OF DEFENDANT'S RULE 26 EXPERT
INFORMATION: March 28, 2006

(3) Expert depositions must be completed by April 28, 2006.

FILING DISPOSITIVE MOTIONS: Motions must be filed by May 31, 2006.

OTHER RELEVANT MATTERS:

No depositions may be scheduled to occur after the discovery cutoff date. All motions, requests for admissions, or other filings that require a response must be filed sufficiently in advance of the discovery cutoff date to enable opposing counsel to respond by the time permitted by the Rules prior to that date.

Motions to compel discovery are to be filed and served by the discovery deadline or within 30 days of the default of the service of the response, answer, or objection, which is the subject of the motion, if the default occurs within 30 days of the discovery deadline, unless the time for filing of such motion is extended for good cause shown, or the objection to the default, response, answer, or objection shall be waived.

The case is set for a jury trial, and the trial is expected to last approximately two (2) days. The pretrial order date, pretrial conference date, and trial date will be set by the presiding judge.

This case is appropriate for ADR. The parties may be directed to engage in court-annexed attorney mediation or private mediation after the close of discovery.

The parties are reminded that pursuant to local Rule 11(a)(1)(A), all motions, except motions pursuant to Fed. R. Civ. P. 12, 56, 59, and 60 shall be accompanied by a proposed order.

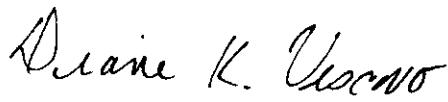
The opposing party may file a response to any motion filed in this matter. Neither party may

file an additional reply, however, without leave of the court. If a party believes that a reply is necessary, it shall file a motion for leave to file a reply accompanied by a memorandum setting forth the reasons for which a reply is required.

The parties have not consented to trial before the magistrate judge.

This order has been entered after consultation with trial counsel pursuant to notice. Absent good cause shown, the scheduling dates set by this order will not be modified or extended.

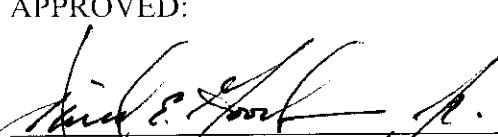
IT IS SO ORDERED.



DIANE K. VESCOVO
UNITED STATES MAGISTRATE JUDGE

DATE: August 18, 2005

APPROVED:

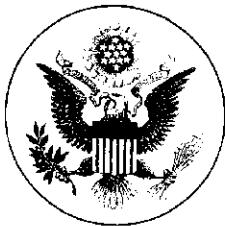


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Notice of Distribution

This notice confirms a copy of the document docketed as number 6 in case 2:05-CV-02355 was distributed by fax, mail, or direct printing on August 23, 2005 to the parties listed.

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Honorable Samuel Mays
US DISTRICT COURT